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DISTRICT OF COLUMBIA BAR

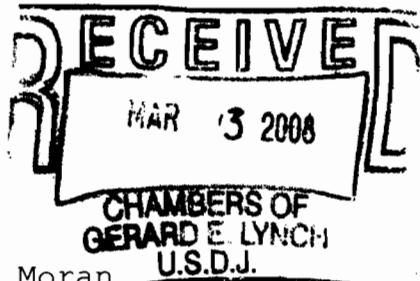
\*\* ALSO A MEMBER OF NEW JERSEY BAR

February 29, 2008

**MEMO ENDORSED**

BY HAND

Honorable Gerard E. Lynch  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007



Re: Tasky v. Moran  
07 CV 6949

Dear Judge Lynch:

I represent Moran Towing Corporation, the defendant in the above-captioned action. I am writing, with the consent of my adversary, to request a 45 day extension of the deadline for completion of fact discovery in this case. The original date, set in the Civil Case Management Plan dated October 18, 2007, is March 15, 2008. There have been no previous requests for an extension of this deadline.

On January 30, 2008, Moran designated a physician to examine the plaintiff. The examining physician is not able to conduct the examination of plaintiff until March 11, 2008. In addition, the plaintiff plans to take the deposition of a treating physician in Virginia.

I will not be able to get a report from the examining physician in time to meet the current deadline of March 15, and the parties cannot organize the deposition of the physician in Virginia by that date either. These are the reasons for the joint request to extend the date for completion of all fact discovery to May 1, 2008.

\*

**PROFETA & EISENSTEIN**

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February 29, 2008

Under the terms of the Civil Case Management Plan, the joint pre-trial order will be due no later than 30 days after the new date for completion of discovery. The only other date affected by this application is the next Case Management conference, which was set for March 21, 2008 at 10:00 a.m. Since that was to be approximately one week after the completion of fact discovery, we suggest that the next Case Management conference be set for a date convenient to the Court in the week of May 5, 2008.

Thank you for your attention to this request.

May 8 at 11:00am.

Respectfully,

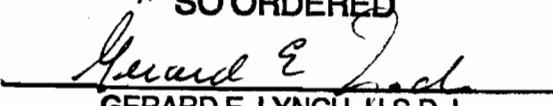


Jethro M. Eisenstein

JME/s

cc: Lawrence A. Arcell, Esq. (VIA TELECOPY)

\*SO ORDERED

  
GERARD E. LYNCH, U.S.D.J.

3/4/08